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**Greyhound Lines, Inc.**

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May 14, 2001

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The Honorable Julie Anna Cirillo  
Acting Deputy Administrator/Chief Safety Officer  
Federal Motor Carrier Safety Administration  
United States Department of Transportation  
400 Seventh Street, SW, Room 3103  
Washington, DC 20590

Dear Administrator *Julie* Cirillo:

I am writing you about two important passenger motor carrier safety issues.

First, I was pleased to hear that you indicated at a recent appropriations hearing that you are considering recommending to Secretary Mineta the removal of passenger motor carriers from the pending hours of service proposal. I urge you to make that recommendation.

As you know from the dialogue that you and I have had on the subject, Greyhound firmly believes that the proposed hours of service changes would make fixed route bus operations less safe. The bus industry has an outstanding safety record and no regulatory action should be taken that could jeopardize that record. A separate proceeding should be instituted to carefully analyze what, if any, hours of service changes are needed to enhance passenger motor carrier safety.

Second, FMCSA just published proposed rules for the entry and safety regulation of Mexican companies providing international and domestic passenger motor carrier service in the United States. Greyhound is very concerned that the proposed rules for Mexican-controlled companies providing domestic passenger motor carrier service in the United States are not adequate to ensure passenger safety.

I know you believe that FMCSA has no higher priority than ensuring the safety of passengers riding in commercial motor carriers. Yet the rules your staff has developed would make the safety of passengers travelling in the US on Mexican-owned carriers a distinctly lower priority.

The proposed rules would establish stringent requirements and oversight for the applications and operations of Mexican companies providing international property and passenger service between Mexico and the US. But the proposal would not apply those requirements and oversight to Mexican-owned companies seeking to provide domestic point-to-point passenger service in the US.

This makes no sense. Assuming FMCSA's highest priority is to protect US passengers, the rules and oversight for Mexican-owned companies providing domestic US service should be at least as stringent as the rules for Mexican companies providing international service. Furthermore, the existence of the lax domestic standards means that Mexican passenger carriers will bypass the more stringent international standards by getting domestic US authority through a subsidiary and combining it with international authority from Mexico.

I hope that this loophole will be closed in the final rules. Thank you for your continuing interest in promoting passenger motor carrier safety.

Sincerely yours,

*Jack*  
Jack W. Hugsand  
Executive Vice President and  
Chief Operations Officer

JWH:pme

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